

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MMAS RESEARCH, LLC,

Plaintiff,

vs.

THE CHILDREN'S HOSPITAL  
CORPORATION, et al.,

Defendants

Civ. A. No. 1:24-cv-12108-DJC

**THE CHILDREN'S HOSPITAL CORPORATION,  
JACOB HARTZ, AND HANNAH PALFREY'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

The Children's Hospital Corporation, Dr. Jacob Hartz, and Hannah Palfrey, move to dismiss the claims against them in the Plaintiff's Amended Complaint on the grounds that they fail to state a claim on which relief can be granted.

A memorandum of law accompanies this motion.

Respectfully submitted,

THE CHILDREN'S HOSPITAL  
CORPORATION, DR. JACOB HARTZ,  
and HANNAH PALFREY

By their attorneys:

*/s/ Theodore J. Folkman*

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Dated: November 4, 2024

CERTIFICATE OF COMPLIANCE

I certify that I conferred with counsel for the plaintiff in a good faith effort to narrow areas of disagreement to the fullest extent.

*/s/ Theodore J. Folkman*